

UNITED STATES DISTRICT COURT for the Western District  
of Oklahoma

: Roman-Vladimirovich, Serpil - 7692 )  
Plaintiff, )

-VS-

1. Sheriff Derek Manning )  
2. Under Sheriff Jeff Miller )  
3. Ms. Murphy 4. Officer Brown )  
5. Lt. Haro 6. Officer Haro )  
7. Capt. 8. Beckham Co. Jail, et al )  
Defendant's )

Case No.

CIV-23-1093-R

**FILED**

NOV 29 2023

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY naa, DEPUTY

COMPLAINT AFFIDAVIT

I. The Parties to this Complaint

A. The Plaintiff

NAME: : Roman-Vladimirovich, Serpil - Address: 108 South 3rd Street  
Savage, Oklahoma (73662)

B. The Defendant's,

1. Sheriff Derek Manning 2. Under Sheriff Jeff Miller  
3. Ms. Murphy 4. Officer Brown 5. Lt. Haro 6. Officer Haro  
7. Capt. 8. Beckham Co. Jail, et al

Address: Beckham Co. Jail 108 S. 3rd St., Savage Ok 73662

II. Basis for Jurisdiction - Federal Question, Civil Rights Other

A. Violations of 1st, 4th, 5th, 8th, 14th Amendments to U.S.  
Constitution, Tit. 42 § 1983, 18 U.S.C. § 241

III. Statement of Claim

Plaintiff is entitled to Complaint based on following claims:

1. Defendants 1-8 deprived Plaintiff of seeking civil appeal  
to the Oklahoma Supreme Court in Custer County (Record 10/15/23)



2. Defendants 1-8 deprived Plaintiff in seeking any address or information regarding Custer County case for perfecting Appeal.
3. Defendant 3 provided no medical assistance regarding disabilities suffering prior to being jailed to assist w perfecting appeal due to being in extreme pain.
4. Defendant 3 denied scheduled 2nd Nov. 23 appointment for medical.
5. Defendants 1-8 denied adequate law library and material needed to meet statutory deadlines in Civil case in Custer County in front of S. Jones 10/18/23.
6. Defendants 1-8 denied mail envelopes stamped and address search to contact Custer County Courts for transcripts and information needed to perfect Civil Appeal in Custer County 10/18/23 in front of Stephanie Jones.
7. Defendants 1-8 denied access to the Jail kiosk complaint system by limiting messages able to send per-day.
8. Defendants 1-8 denied adequate nutritional diet and religious exemptions for a proper functioning mindset & body.
9. Defendant 3 denied medical extra mattress and pillow for prior disabilities to help get sleep and rest delaying.

#### IV. Irreparable Injury

On 10/18/23 in Custer County in front of Magistrate Stephanie Jones, Plaintiff for Defendant ROMAN SEPPLA-4437 Estate "Person" on the record stated an appeal will be sought, but while imprisoned at Bechtel Jail all defendants did not allow access to adequate law library, material, nutrition, medical, kiosk complaints to be able to perform a successful appeal due to missing statutory requirements based on defendants actions.



## V. Relief

The Plaintiff is seeking \$25,000 for damages suffered in connection with defendant's ill-actions.

The Plaintiff is also seeking Defendant provide outside medical and advocate counsel for legal case research due to defendant's ignorance of prisoners rights.

## VI. Certification and Closing

Under Federal Rule of Civil procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this Complaint: (1) is not being presented for an improper purpose, such as harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law; (3) the factual certifications have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the Complaint otherwise complies with the requirements of rule 11. (5) All Federal Jail Complaints been exhausted before filing.

Date: 20<sup>th</sup> November 2023 - *Aditya* *Sanon II*; *Lyft*: *52d*  
without prejudice UCC 1003, 1103.6

Under penalty of perjury the information fore-in is the truth the whole truth, so help me God.

Note: Jail Delay denied or unavailable



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